

**FILED****2/15/2023**THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURTUNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

STEPHEN R. JENKINS;  
KEITH R. MCCORMICK,  
also known as "Keith Lopez";  
DANIEL HEISE;  
DONALD W. GRENIER, JR.;  
JOSE HERNANDEZ; and  
WILLIAM F. KOCH

CASE NUMBER: 23 CR 93

**UNDER SEAL****CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. From on or about February 1, 2022 to on or about February 8, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere, , the defendant(s) violated:

*Code Section*Title 21, United States Code, Sections  
841(a)(1) and 846*Offense Description*have knowingly conspired to distribute a  
controlled substance, namely, 50 grams or  
more of methamphetamine

This criminal complaint is based upon these facts:

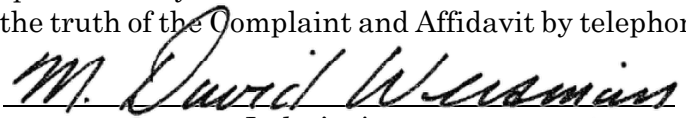
X Continued on the attached sheet.

/s/ Kevin E. Hegi (MDW with permission)

KEVIN E. HEGI

Postal Inspector, U.S. Postal Inspection Service

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: February 15, 2023
  
 Judge's signature
City and state: Chicago, IllinoisM. DAVID WEISMAN, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

**AFFIDAVIT**

I, KEVIN E. HEGI, being duly sworn, state as follows:

1. I am a Postal Inspector with the U.S. Postal Inspection Service (“USPIS”). I have been so employed since approximately February 2017. Since joining the USPIS as a Postal Inspector, I have been assigned to the USPIS Contraband Interdiction and Investigations team. Since approximately October 2018, I have also been assigned as a Task Force Officer to a Drug Enforcement Administration (“DEA”) and Federal Bureau of Investigation (“FBI”) drug trafficking task force. Prior to becoming employed with the USPIS, I was a Staff Operations Specialist with the FBI for approximately seven years.

2. As part of my duties as a USPIS Postal Inspector, I investigate criminal violations relating to narcotics trafficking offenses, including criminal violations of the Federal Controlled Substance and money laundering laws, including, but not limited to Title 18, United States Code, Sections 1956, and 1957, and Title 21, United States Code, Sections 841, 843, 846, 848, 952 and 963. I have been involved with various electronic surveillance methods, the debriefing of defendants, informants, and witnesses, as well as others who have knowledge of the distribution, transportation, storage and importation of controlled substances.

3. This affidavit is submitted in support of a criminal complaint alleging that STEPHEN R. JENKINS, KEITH R. MCCORMICK, also known as KEITH

LOPEZ, DANIEL HEISE, DONALD W. GRENIER JR., JOSE HERNANDEZ, and WILLIAM F. KOCH have violated Title 21, United States Code, Sections 841(a)(1) and 846. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging JENKINS, MCCORMICK, HEISE, GRENIER, HERNANDEZ, and KOCH with conspiracy to distribute a controlled substance, namely, 50 grams or more of (actual) methamphetamine, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

4. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, and from persons with knowledge regarding relevant facts.

## **I. BACKGROUND INFORMATION**

5. In approximately May 2022, law enforcement initiated an investigation of a drug trafficking organization (“DTO”) that is shipping methamphetamine from Sacramento, California to Chicago, Illinois via the U.S. mail, and distributing the methamphetamine in and around Chicago. Law enforcement has identified over approximately 200 parcels suspected of containing methamphetamine that were shipped from Sacramento to Chicago between February 2022 and the present (the

“Subject Parcels”). The Subject Parcels<sup>1</sup> were associated with the same shipping account belonging to Alhambra Mail & Parcel, a shipping service business located in Sacramento (the “Alhambra shipping business”). Additionally, the postage for each parcel was prepaid for electronically, all were of similar weight, some were mailed at the same time, and all were sent to individuals in the Chicago area. Law enforcement has seized methamphetamine from at least nine of the Subject Parcels, including parcels addressed to GRENIER, MCCORMICK, KOCH, HERNANDEZ, and HEISE.

6. A confidential law enforcement source (“CS-1”) who was previously involved in the DTO under investigation has provided information to law enforcement about the operation that is corroborated by substantial independent evidence.<sup>2</sup> According to the investigation to date and information provided by CS-1, I have learned the following about the roles of each of the principal targets:

a. JENKINS and HEISE, both based in Chicago, are the leaders of the DTO.<sup>3</sup> According to CS-1 and the investigation to date, since approximately

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<sup>1</sup> Throughout this affidavit, we identified Subject Parcels of interest based on their shipping labels having been created from the Alhambra shipping business account, their similar size and weight, their destination to targets of this investigation in the Chicago area, and their similar return addresses and names.

<sup>2</sup> CS-1 has been cooperating with law enforcement since approximately June 2022. CS-1 has two prior arrests for narcotics and DUI. CS-1 is cooperating in hopes of receiving reduced charges and/or consideration for a pending state arrest on narcotics charges, but no promises have been made by federal authorities. Law enforcement believes the information provided by CS-1 is credible as it is corroborated in significant respects by independent evidence, including physical surveillance, narcotics seizures, phone records, recovered phone and computer communications, consensually recorded phone calls and conversations, in-person meetings, and a review of U.S. Postal Service records, among other ways.

<sup>3</sup> CS-1 has correctly identified unmarked photographs of JENKINS and HEISE obtained from the Illinois Secretary of State.

January or February 2022, at JENKINS' and HEISE's direction, MCCORMICK, who is based in Sacramento, has regularly shipped pound quantities of methamphetamine via U.S. mail to DTO members in Chicago (Subject Parcels), including HEISE, HERNANDEZ, GRENIER, KOCH, and himself. Once the narcotics arrive in Chicago, they are transported to other DTO members, including JENKINS or HEISE, who sell the methamphetamine to local customers. JENKINS, HEISE, and/or other DTO members then arrange to ship cash narcotics proceeds back to MCCORMICK in Sacramento via private shipping companies, including FedEx and UPS.

b. JENKINS has a federal conviction for conspiracy to distribute a controlled substance (methamphetamine) and one prior arrest for possession of drug paraphernalia. Based on my review of public records and information from CS-1, in June 2022, JENKINS was sentenced to a six-month term of incarceration and was in federal prison for a violation of his supervised release. Prior to his federal custody, JENKINS created a structure for the DTO to operate in his absence and to continue to receive a commission for the continued sales of methamphetamine.

c. HEISE is responsible for coordinating the shipment of Subject Parcels containing methamphetamine from Sacramento to Chicago since at least March 2022 and is involved in further distributing the methamphetamine to local drug customers. After JENKINS went into federal custody, HEISE took over leadership of the DTO in JENKINS' absence. According to USPS postal records, HEISE has been the listed recipient of at least 20 parcels since March 2022, one of

which has been intercepted by law enforcement and found to contain methamphetamine.

d. MCCORMICK is the source of supply and the mailer of the Subject Parcels containing methamphetamine shipped from Sacramento to Chicago via the U.S. mail. MCCORMICK has multiple prior convictions and arrests in California for possession with intent to distribute controlled substances. According to USPS records, MCCORMICK is suspected to have shipped over 200 packages to individuals in the Chicago area since February 2022, including parcels addressed to GRENIER, MCCORMICK, KOCH, HERNANDEZ, and HEISE, nine of which were intercepted by law enforcement and found to contain methamphetamine. In total, law enforcement has seized over nine pounds of methamphetamine from this DTO.

e. GRENIER is involved in receiving numerous shipments of Subject Parcels containing methamphetamine from Sacramento to Chicago, and further involved in the distribution of methamphetamine to local customers, including to an Undercover Officer (“UCO”) as part of the investigation. GRENIER has prior arrests for narcotics and possession of marijuana. According to USPS records, GRENIER is the recipient of at least 45 packages since April 2022, two of which have been intercepted by law enforcement and found to contain methamphetamine.

f. HERNANDEZ is involved in receiving numerous shipments of Subject Parcels containing methamphetamine from Sacramento to Chicago and further involved in the distribution of methamphetamine to local customers.

According to USPS records, HERNANDEZ is the recipient of at least 60 packages since May 2022, one of which has been intercepted by law enforcement and found to contain methamphetamine.

g. KOCH is involved in receiving numerous shipments of Subject Parcels containing methamphetamine from Sacramento to Chicago and further involved in the distribution of methamphetamine to local customers. According to USPS records, KOCH is the recipient of at least 10 packages since February 2022, one of which has been intercepted by law enforcement and found to contain methamphetamine.

## II. INVESTIGATION

### Initial Seizures and Surveillances of Subject Parcels Associated to DTO

7. On or about May 14, 2022, according to North Riverside Police Department personnel, a relative of Individual A had accidentally opened a Subject Parcel mailed in Sacramento to Individual A at a residence located on the 2200 block of Park Avenue in North Riverside, Illinois (“North Riverside Parcel”) and discovered it to contain a crystalline-like substance, after which the North Riverside Parcel was turned over to law enforcement. The North Riverside Parcel was subsequently determined to contain an inner white cardboard box which further contained 449.5 grams of methamphetamine hydrochloride with a purity of approximately 97%. According to a review of U.S. Postal Service (“USPS”) business records, additional Subject Parcels were also identified as mailed to GRENIER and HERNANDEZ on or about May 12, 2022, the same day that the North Riverside Parcel was mailed.

8. According to a review of USPS business records, a tracking inquiry was made to the USPS Customer Service Call Center regarding the intercepted North Riverside Parcel destined to Individual A. The caller identified himself as HERNANDEZ and discussed having a power-of-attorney for Individual A. HERNANDEZ indicated he unsuccessfully attempted to pick up the North Riverside Parcel on several occasions from the post office. Additionally, an UCO acting as a USPS customer service representative later contacted HERNANDEZ by telephone, who provided further statements regarding his attempts to locate the North Riverside Parcel destined to the residence of Individual A.

9. On or about May 17, 2022, law enforcement executed a federal search warrant (N.D. Ill. Case No. 22 M 403) on one of the identified Subject Parcels mailed from Sacramento to the residence of Individual B located on the 600 block of West Barry Street in Chicago ("Barry Parcel"). Law enforcement recovered an inner white cardboard box which further contained 450.1 grams of methamphetamine with a purity of approximately 100%. According to a review of USPS business records, a total of approximately more than 10 Subject Parcels were identified as mailed from Sacramento associated<sup>4</sup> with the Alhambra shipping business and destined to Individual B from approximately March 2022 through May 2022. Additionally, on or about May 11, 2022, the date on which the Barry Parcel was mailed, additional Subject Parcels were also identified as mailed to KOCH and HERNANDEZ.

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<sup>4</sup> These parcels were all prepaid electronically, roughly the same size and weight, and sent from the Alhambra shipping business in Sacramento, CA.



10. On or about May 19, 2022, law enforcement conducted surveillance of the delivery of two Subject Parcels mailed from Sacramento to the residence of HEISE located on the 5100 block of South Neenah Avenue in Chicago and the residence of HERNANDEZ located on the 5800 block of West 60th Street in Chicago. Law enforcement also identified a third Subject Parcel, destined to the residence of KOCH located at an apartment on the 1100 block of West Roscoe Street in Chicago, as mailed on the same day as the Subject Parcels destined to HEISE and HERNANDEZ. Law enforcement subsequently identified HEISE and HERNANDEZ as accepting delivery of the respective Subject Parcels to their residences.<sup>5</sup>

11. On or about May 23, 2022, law enforcement conducted surveillance of the delivery of another Subject Parcel shipped from Sacramento to the residence of KOCH. Law enforcement subsequently identified KOCH as accepting delivery of the Subject Parcel.<sup>6</sup> Law enforcement identified an additional individual, later identified as CS-1,<sup>7</sup> travel to the area of KOCH's residence, enter the residential building with a trash can, and shortly after depart the area with the same trash can, which CS-1 later confirmed held the Subject Parcel containing approximately one pound of methamphetamine, and then travel to CS-1's residence. According to a review of USPS business records, additional Subject Parcels were also identified as mailed to

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<sup>5</sup> Law enforcement identified HEISE and HERNANDEZ through comparing them with known photographs from the Illinois Secretary of State.

<sup>6</sup> Agents identified KOCH by comparing him to his known driver's license photograph.

<sup>7</sup> CS-1 was not yet cooperating with law enforcement during this time.

GRENIER and HERNANDEZ on or about May 19, 2022, the same date the Subject Parcel destined to KOCH was mailed.

12. On or about May 24, 2022, law enforcement conducted surveillance of a Subject Parcel shipped from Sacramento, on or about May 20, 2022, to the residence of GRENIER located on the 4000 block of North Harding Avenue in Chicago. While accepting delivery of the Subject Parcel from an UCO posing as a USPS mail carrier, GRENIER asked if there was a second package. GRENIER further stated he was still waiting for a package that was marked as delivered, but that he had not yet received. GRENIER further stated he had attempted to contact the post office concerning the second parcel and that it contained a circuit board for a vacuum cleaner that he needed.<sup>8</sup>

13. Law enforcement later observed GRENIER exit his residential building holding a dark red bag with a bulge inside consistent with the size and shape of the delivered Subject Parcel. GRENIER approached the driver's side of a rideshare vehicle and then walked across the street without the bag and re-entered the residential building. The rideshare vehicle then departed the area and law enforcement maintained surveillance on the vehicle. Law enforcement further observed the rideshare vehicle pull into the parking lot for the Heart O' Chicago motel located at the 5900 block of North Ridge Avenue in Chicago and park in the middle

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<sup>8</sup> Law enforcement identified GRENIER through comparing him with known driver's license photographs. During this conversation, GRENIER was referring to another USPS parcel that was shipped, on or about May 19, 2022, from the Alhambra shipping business to GRENIER (detailed below as "Harding Parcel 1"). On or about May 25, 2022, law enforcement executed a search warrant for Harding Parcel 1 and recovered 447.9 grams of methamphetamine.

of the parking lot. Law enforcement then observed JENKINS exit one of the motel room doors and approach the driver's side of the rideshare vehicle. JENKINS removed the dark colored red bag from the vehicle and re-entered the same motel door.<sup>9</sup>

14. Shortly thereafter, law enforcement interviewed the driver of the rideshare vehicle, who stated he was an Uber driver who had just completed an Uber Connect delivery to the Heart O' Chicago motel from the area of GRENIER's residence. The driver identified a driver's license photograph of GRENIER as the individual who placed a bag into his vehicle's back seat at the pick-up location at the 4000 block of North Harding Avenue. The driver also identified a state identification photograph of JENKINS as the individual who retrieved the bag from his vehicle at the Heart O' Chicago motel.<sup>10</sup> According to a review of USPS business records, an additional Subject Parcel was also identified as mailed to HERNANDEZ on or about May 20, 2022, the same date the Subject Parcel destined to GRENIER was mailed.

15. On or about May 25, 2022, law enforcement executed a federal search warrant (N.D.Ill. Case No. 22 M 435) on one of the identified Subject Parcels mailed from Sacramento on or about May 19, 2022 to the residence of GRENIER (Harding Parcel 1). Law enforcement recovered an inner white cardboard box which further

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<sup>9</sup> Law enforcement identified JENKINS through comparing him with a known Illinois Secretary of State photograph.

<sup>10</sup> According to court-authorized records received from Uber, the Uber Connect ride associated to the Subject Parcel delivered to GRENIER was associated with JENKINS' Uber account. Additionally, the records showed JENKINS communicated with the Uber drive in reference to GRENIER, messaging: "don [GRENIER] will drop off" and "he shouls [should] be our [out] shortly."

contained 447.9 grams of methamphetamine with a purity of approximately 98%. According to a review of USPS business records, additional Subject Parcels were also identified as mailed to KOCH and HERNANDEZ on the same date as Harding Parcel 1.

16. According to a review of USPS business records, a tracking inquiry was made to the USPS Customer Service Call Center from phone number (773) XXX-9076 (“Grenier Phone”) regarding Harding Parcel 1. The caller identified himself as GRENIER and as the intended recipient of Harding Parcel 1. During the call, GRENIER inquired about the delivery status of the Harding Parcel 1 and provided a description of the contents as an electronic part for a vacuum cleaner. Additionally, an UCO acting as a USPS customer service representative later contacted GRENIER, who provided further statements regarding his attempts to locate Harding Parcel 1 and identified the contents as associated with a vacuum cleaner part.

17. On or about May 27, 2022, law enforcement in Sacramento conducted surveillance on the residence of MCCORMICK located on the 1500 block of 27th Street in Sacramento. Law enforcement observed MCCORMICK leave the residence wearing gloves and carrying multiple Subject Parcels. MCCORMICK subsequently travelled to the Alhambra shipping business, where he purchased postage for the Subject Parcels, and further travelled to a USPS post office where MCCORMICK mailed three Subject Parcels, including one to the residence of KOCH, one to the residence of HERNANDEZ, and an additional parcel destined to the residence of Individual C located on the 5000 block of North Kenmore Avenue in Chicago

(“Kenmore Parcel”). Additional Subject Parcels were also identified as mailed earlier on the same day destined to KOCH and HERNANDEZ. On or about June 2, 2022, law enforcement executed a search warrant (E.D.Cal. Case No. 2:22-SW-0398-KJN) on the Kenmore Parcel and recovered approximately 457 grams of suspect methamphetamine<sup>11</sup> (pending laboratory results). According to a review of USPS records, a prior additional Subject Parcel was mailed in Sacramento from the Alhambra shipping business in and around March 2022, which was also destined to Individual C at the same address, but a different apartment number.<sup>12</sup>

18. On or about June 1, 2022, law enforcement conducted surveillance of the delivery of one of the Subject Parcels shipped to the residence of KOCH. Law enforcement further identified additional Subject Parcels (including the Kenmore Parcel) destined to KOCH and HERNANDEZ which were mailed on the same date from the Alhambra shipping business. Law enforcement subsequently identified KOCH<sup>13</sup> as accepting delivery of the Subject Parcel. Law enforcement later observed JENKINS arrive in the area in a rideshare vehicle and enter the residential building. Shortly after, JENKINS departed the residence with a parcel consistent in shape, size, and appearance to the same delivered Subject Parcel. Law enforcement further

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<sup>11</sup> Throughout this affidavit, where I referred to suspect methamphetamine, I believe these substances to be methamphetamine based on a field test that was positive for methamphetamine as well as the general appearance and characteristics of the crystalline substances, which I know based on my training and experience is consistent with methamphetamine.

<sup>12</sup> Additionally, from approximately March 2022 through December 2022, over 10 additional Subject Parcels were mailed to various recipient names and different apartment numbers in the same building as the Kenmore Parcel.

<sup>13</sup> Agents identified KOCH by comparing him to his known driver’s license photograph.

observed JENKINS walk with this parcel and enter an additional rideshare vehicle, which transported JENKINS to The Blackstone hotel located in Chicago. JENKINS entered the hotel with this parcel and agents subsequently spoke with hotel staff, who identified JENKINS as having a room reservation which was scheduled for checkout the following day.

19. On or about June 2, 2022, hotel staff gave law enforcement access to and consented to the search of JENKINS' room for any abandoned items after he was observed departing the hotel. Law enforcement subsequently recovered one small clear plastic baggie containing suspect methamphetamine from the floor of the closet area in the room, and loose off-white crystalline-like substances in many different areas of the hotel room. Those substances were laboratory tested and confirmed to contain 0.45 grams of methamphetamine hydrochloride with a purity of approximately 98%.

*Examination of Communications Related to Initial Seizures and Surveillances Related to DTO*

20. Based on my review of public court records, I know that on or about June 3, 2022, JENKINS was sentenced to a six-month term of incarceration in connection with a supervised released violation for a 2020 conviction for conspiracy to distribute methamphetamine in the Western District of Pennsylvania.<sup>14</sup> According to court records, the basis for the violation was possession of a controlled substance. According

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<sup>14</sup> According to public records, JENKINS was charged in W.D.Pa. Case No. 19-cr-00113, pled guilty on June 15, 2020, and sentenced to a three year term of probation on October 21, 2020. The court transferred jurisdiction to the Northern District of Illinois, where JENKINS resides, in November 2020.

to CS-1 and the investigation to date, since JENKINS reported to prison, HEISE has taken over DTO operations.

21. On or about August 1, 2022, law enforcement obtained search warrants for a laptop computer identified herein as the Jenkins Computer (N.D. Ill. Case No. 22 M 587) and a cell phone with the phone number (612) XXX-1393, identified herein as the Jenkins Phone (N.D. Ill. Case No. 22 M 588). Substantial independent evidence corroborates that JENKINS was the user of the Jenkins Phone prior to his term of incarceration that began on June 3, 2022.<sup>15</sup>

22. According to a preliminary review by law enforcement of the search results for the two devices, the Jenkins Phone and Jenkins Computer contained numerous communications (including Signal and Telegram) which discussed the shipment of Subject Parcels and parcels containing narcotics proceeds, as well as the distribution of methamphetamine, involving JENKINS and several co-conspirators, including HEISE, MCCORMICK, GRENIER, HERNANDEZ, KOCH, and CS-1. JENKINS also discussed the structure of the DTO, including pricing for obtaining and distributing the methamphetamine from MCCORMICK as well as payments for

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<sup>15</sup> Subscriber records obtained from AT&T Wireless show the Jenkins Phone was activated on or about January 28, 2014, in JENKINS' name. Law enforcement also determined, through physical surveillance and interviews with the hotel staff where they positively identified JENKINS from a known Illinois Secretary of State photograph, that JENKINS checked-in to a hotel in Chicago just prior to going into federal custody on or about June 3, 2022, and JENKINS listed the Jenkins Phone as his phone number under the hotel reservation. Furthermore, a preliminary review of the toll records for the Jenkins Phone showed the last outgoing phone calls and text messages were placed on or about June 3, 2022, the same date JENKINS went into federal custody.

co-conspirators for their involvement in receiving the Subject Parcels, as well as plans for HEISE to resume JENKINS' leadership role in Chicago for the DTO while incarcerated, along with money owed to JENKINS for each distributed Subject Parcel containing methamphetamine that was coordinated between MCCORMICK and HEISE during this time.

23. For example, I observed a conversation beginning on or about April 7, 2022, between JENKINS and HEISE, using phone number (773) XXX-6666 ("Heise Phone"), via the Signal messaging application, stored on the Jenkins computer and linked to the Jenkins Phone. During this conversation JENKINS obtains from HEISE the contact information for GRENIER to use as a recipient for Subject Parcels of methamphetamine. I have included my interpretation of some of the coded language and shorthand used in these messages in brackets, based on my training and experience, my conversations with other agents, information provided by CS-1, and my background of this investigation. In addition, only portions of the communications are contained below.

a. JENKINS messaged, "Also, do you know anyone else who could be a receiver [recipient for Subject Parcels]? I'd make it worth your while."

b. On or about April 8, 2022, HEISE replied, "I've got one person I know of so far that would be a good receiver" and "He's older and knows his shit."

c. JENKINS further messaged, "How much does he want to be paid and how much do you want to be paid" and "I give some receivers as little as two balls [quantity of methamphetamine]."



d. On or about April 9, 2022, HEISE sent an image of the contact “Don” and the phone number associated with the Grenier Phone, as well as the address of GRENIER’s residence.

e. JENKINS asked, “last name?” and HEISE replied, “Grenier.”

f. On or about April 11, 2022, JENKINS asked, “what’s don’s [GRENIER] number” and HEISE replied with the phone number associated with the Grenier Phone.

g. JENKINS further messaged, “apartment number i meant. Also how do you want to handle him [GRENIER]? If you want to candle [handle] him exclusively I will give you an ounce [quantity of methamphetamine] for every package [Subject Parcel] he receives.”

24. During this same message string, JENKINS and HEISE also discussed the delivery status of several Subject Parcels to HEISE. In reference to one of the Subject Parcels, HEISE sent JENKINS an image of one of the Subject Parcels addressed to HEISE which had a visible rip on the front of the package. On or about April 13, 2022, JENKINS messaged, “the rip concerns me. could anything [methamphetamine] have been removed” and “so does it look like anything was removed.” HEISE replied, “I’m waiting [weighing] it now” and further messaged, “Right around 450 g [grams, approximately one pound of methamphetamine]” and “Give or take a few due to the bags [packaging].” JENKINS asked, “Does that include the box” and HEISE replied, “No.” JENKINS messaged, “u opened? cool” and HEISE replied, “Yea I was concerned about the rip also.”

25. On or about April 15, 2022, JENKINS messaged HEISE, “hey. so your friend don [GRENIER]. Do you want tp handle him—ill pay you 300 or 6b [quantity of methamphetamine – 6 “balls”], or should i contact him directly” and HEISE replied, “I see him [GRENIER] enough so I could probably handle it” and then confirmed GRENIER’s apartment number at his residence. On or about April 18, 2022, HEISE again provided JENKINS with GRENIER’s full name and mailing address. JENKINS and HEISE further discussed specific Subject Parcels, including images showing mailing labels of Subject Parcels destined to HEISE and GRENIER. On or about April 19, 2022, when discussing payment related to Subject Parcels, HEISE messaged, “Yes but still am owed the finding Don [GRENIER] fee I believe.” JENKINS replied, “payment foe don [GRENIER] is 6b”; “or 300 [money]”; “my hope is you can pay him 2b”; and “and keep 4 for yourself. This for every single shipment [Subject Parcels to GRENIER].” HEISE replied, “Yes that’s cool with me.” JENKINS and HEISE further discussed GRENIER receiving and transporting Subject Parcels to HEISE, as well as HEISE storing methamphetamine for JENKINS and JENKINS referring methamphetamine customers to HEISE.

26. I also observed messages on the Jenkins Phone between JENKINS and MCCORMICK, utilizing phone number (916) XXX-9092 (“McCormick Phone”), via Signal where they discussed the shipment of Subject Parcels containing methamphetamine. For example, on or about May 14, 2022, JENKINS messaged, “so to the order [of methamphetamine]. i paid for 7 [pounds of methamphetamine] and

you sent 6, so we start with a balance of 2300.”<sup>16</sup> On or about May 17, 2022, MCCORMICK messaged JENKINS with images of mailing labels for three Subject Parcels to KOCH, HEISE, and HERNANDEZ mailed on the same date.

27. In a group chat created by JENKINS saved on the Jenkins Computer and linked to the Jenkins Phone, on or about May 1, 2022, entitled “meet dan,” I observed messages where JENKINS introduced HEISE to MCCORMICK. JENKINS, HEISE, and MCCORMICK then utilized the group chat to extensively communicate regarding the distribution of methamphetamine via the Subject Parcels, as well as the parcel recipients, including HERNANDEZ, GRENIER, and KOCH. JENKINS messaged, “Dan [HEISE] has a second receiver on [in addition to GRENIER].” MCCORMICK asked, “Who is the first” and JENKINS replied, “don [GRENIER] is dan’s receiver”; and “He [HEISE] is retrieving the address for the second receiver.” HEISE then replied, “My second receivers name is Jose hernandez jr” and later provided HERNANDEZ’s name again and the mailing address for the residence of HERNANDEZ. JENKINS and MCCORMICK mentioned MCCORMICK coming to Chicago and JENKINS messaged, “a Awesome make sure you guys made [meet] up while you’re there. Dan [HEISE] could be helpful in a lot of ways possible including coming up with schemes on how to get product [methamphetamine] safely here” and further described, “He’s [HEISE] actually buy Midway [HEISE’s residence is near Midway Airport] so certain between you and your moms house [Oak Forest, Illinois]

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<sup>16</sup> Based on USPS records and my investigation, six Subject Parcels, including the intercepted Barry Parcel, were mailed to Individual A, KOCH, HERNANDEZ, and GRENIER from on or about May 11 to May 12, 2022.

He works at a hotel in Chicago downtown [HEISE was employed at Hotel Chicago Downtown].” JENKINS, HEISE, and MCCORMICK then further discussed the shipment of Subject Parcels to HERNANDEZ and instructed HEISE on how to mail parcels containing narcotics proceeds to MCCORMICK.

28. JENKINS, HEISE, and MCCORMICK further discussed the movement of narcotics and narcotics proceeds via the mail. For example, on or about May 15, 2022, JENKINS messaged, “do dan [HEISE], we pay keith [MCCORMICK] 2300 each [per pound of methamphetamine]. las [last] week we had 7 [pounds of methamphetamine] paid for But keitj [MCCORMICK] sent.6, so we started out the cycle with 2300 balance.” JENKINS further described, “i sent keith [MCCORMICK] 3500 yesterday and i will send. 3400 today”; “that will be in we will have paid 9200, which gets us 4?oew” and “4 more [additional pounds of methamphetamine].”

29. On the same date, JENKINS, HEISE, and MCCORMICK further discussed the seizure of the North Riverside Parcel and Barry Parcel. For example, on or about May 15, 2022, MCCORMICK messaged, “I have 12 [pounds of methamphetamine] vacuum seed [sealed] doxed [boxed] n wrapped.” JENKINS replied, “wow, 12 [pounds of methamphetamine] ready ? smashing. I” and further messaged, “keith [MCCORMICK] we have a receivers [Subject Parcel recipients] crisis again, actually 3 separate ones: 1. [Individual A] sketched out and cant be used again [to receive Subject Parcels] 2. will [KOCH] is furious with me, with some cause, for me not being clear on who he should procuct from [receive methamphetamine in exchange for receiving Subject Parcels], etc. he threatened to ro to [first name of

another individual involved in receiving Subject Parcels and distributing methamphetamine] and said he [KOCH] quit [receiving Subject Parcels]. he [KOCH] can be lured back in bu others with free stuff [narcotics]. 3. I should've never sent to [Individual B] again as im fearful a box Address to him was at [Individual D's] Is [his] package [Barry Parcel] just been stuck at the USPS Chicago distribution center for two days Notice has happened in the past and was not an issue." JENKINS further messaged, "What all this means is that at the current moment, Don [GRENIER] snr Jose [HERNANDEZ] are only receivers. keith [MCCORMICK] can 2 [pounds of methamphetamine] go out first thing monday Morning as they will be repeats."

30. JENKINS further messaged screenshots showing Signal messages from HEISE which showed images of Google results for the tracking status of the North Riverside Parcel in which HEISE stated, "Thats what [Individual A] tracking says now." In the screenshot images of the conversation between HEISE and JENKINS, JENKINS replied, "on. those are the things [parcel scanning events] we dont want to see [reference to possible law enforcement activity]." JENKINS and HEISE further discussed if Individual A resided at the residence listed on the North Riverside Parcel. JENKINS then messaged images of the mailing labels of the North Riverside Parcel, along with additional Subject Parcels destined to GRENIER and HERNANDEZ which were mailed on the same date as the North Riverside Parcel. JENKINS further messaged, "looping keith [McCORMICK] in. keith, first off, kevin star [fictitious sender name utilized for the North Riverside Parcel and Subject Parcel destined to HERNANDEZ] should be retired as a sender [due to possible law enforcement

activity].” JENKINS then messaged, “second off Dan [HEISE], how do you communicate with [Individual A]? is there either text message or banking history between the two of u? if [Individual A] phone were uploaded [by law enforcement] today, what commination would authorities see.” JENKINS further messaged, “so 2 mistakes were made. i take the blame: 1. it was suburban address. only city of Chicago allowed” and “2. the receiver should be on the electric bill foe address.”

31. On the same date, JENKINS, HEISE, and MCCORMICK further discussed the seizure of the North Riverside Parcel and Barry Parcel. HEISE messaged, “And talked to a friend who knows a friend who works at the Post Office tonight” and “He said that we have more than likely nothing to worry about with [Individual A] package [North Riverside Parcel] because they don’t they didn’t give a specific time to complete the package up and they [law enforcement] don’t have the resources to have the cops there the whole time waiting on one person to pick up a package [containing narcotics] you know that’s just 1 of the valid points that he made.” JENKINS then asked, “can he check on [Individual B – reference to Barry Parcel]? Chicago distribution center for two days.” On or about May 16, 2022, JENKINS sent screenshots images showing the tracking status for the Barry Parcel. MCCORMICK messaged, “I need current list of who is good to mail out early tomorrow” and JENKINS replied, “jose, don, will.” JENKINS further stated, “im sitting on 5k [money] thar can overnight tomorrow [to MCCORMICK] i should get it up to 5700 which will be even 5.” JENKINS further messaged, “[Individual A] is problematic”; “we need to nor [not] use [Individual B] and [Individual A] return

senders”; and “return senders. do not use kevin star or jane cama [Coma; listed fictitious sender names of the North Riverside Parcel and Barry Parcel].”

32. On or about May 18, 2022, JENKINS shared images showing mailing labels for Subject Parcels destined to HEISE and HERNANDEZ. JENKINS messaged, “keith [MCCORMICK] i just noticed this. it was supposed to go to don [GRENIER], not dan [HEISE]” and “thar said, can you [MCCORMICK] a send one to don [GRENIER] today. dan [HEISE] you get to your guy before one today and you’re gonna get it to the post office before three [reference to North Riverside Parcel].” MCCORMICK messaged, “wtf [what the fuck] guys I confirmed [Subject Parcel recipients] on the phone and sent info.” HEISE messaged, “Steve [JENKINS] I’m at at work 1”; “11 to 7 but what do you need me to do”; “Jose [HERNANDEZ] is taking [Individual A] to the post office now [to attempt to pick-up the North Riverside Parcel]”; and “Sorry Keith [MCCORMICK]. Was confused thought you heard Don [GRENIER] not dan [HEISE].” MCCORMICK replied, “There nothing i can do about it.” JENKINS later messaged, “dan [HEISE]. Make sure that jose [HERNANDEZ] and [Individual A] are alreachable and there are no 3 hour delays in responsiveness.”

33. JENKINS then further messaged a screenshot of a Signal message with a username associated to Individual B, in which JENKINS asked, “hey are you at home or work.” Individual B replied, “Work” and “I was gonna message you. The post office [UCO acting as a mail carrier] said I had a package [Barry Parcel] to sign for. I wasn’t there and said I wasn’t expecting anything.” JENKINS replied, “do not, i

repeat, do not sign for anything [reference to possible law enforcement activity].” JENKINS further messaged Individual B contact information for his attorney.

34. On or about May 19, 2022, MCCORMICK messaged, “Don [GRENIER] and wills [KOCH] last name” and JENKINS replied, “william koch” and “don grenier” as well as providing images of the shipping labels for the North Riverside Parcel and Subject Parcels to HERNANDEZ and GRENIER. MCCORMICK then messaged with images of Subject Parcel mailings to KOCH, HERNANDEZ, and Harding Parcel 1 destined to GRENIER. In reference to Harding Parcel 1, MCCORMICK messaged, “Return sender randomly selected by me Whitepages.Com” and “Resident over 40 with 10 years plus at home” explaining the fictitious sender he utilized for Harding Parcel 1. HEISE messaged, “I got mine [Subject Parcel] today” and JENKINS messaged, “outstanding”; “Let’s refresh all of them then [reference to sender names for Subject Parcels]”; and “One return sender per package And used only one once is obviously ideal [to avoid law enforcement detection].”

35. On or about May 22, 2022, in reference to Harding Parcel 1, I further observed messages within the MCCORMICK/JENKINS/HEISE group chat discussing the status of the intercepted parcel:

a. JENKINS sent a message “so you 3 and q fraction in inventory [pounds of methamphetamine]” to which HEISE replied, “2 and fractions.” JENKINS further messaged, “Sorry that was meant for Dan [HEISE] only” and “doesnt don [GRENIER] have a.” HEISE replied, “Yea I think he [GRENIER] does let me double check” and “Or it’s [Individual A] that would make the 3<sup>rd</sup> [pound of



methamphetamine].” HEISE sent screenshot of a Signal messaging conversation with “Don” [GRENIER] in which GRENIER stated, “Not at the moment when was supposed to be delivered here yesterday [Harding Parcel 1] and I never saw it I tried calling the post office first their offices are all closed so I filed a missing package like they recommended and I have to wait till tomorrow 8:30 to call them to find out where they left this particular package and the next one is due tomorrow.”

b. JENKINS later checked on the status of methamphetamine inventory, asking “so believe you [HEISE] were atb 1 [pound of inventory] and change to start the week. You should have received 1 don 1 dan 2 jose 1 [Individual A]” and further asked, “p So is [Individual A] still up in the air, inventory [amount of methamphetamine] shuld have increased net 2 [pounds]” and “What tracking number is Don [GRENIER] referring to.”

c. HEISE replied, “[Individual A] is still up in the air. I have 2 [Subject Parcels] that are full [each containing a pound of methamphetamine]. The third has a few zips [ounces of methamphetamine] gone that I sold and payments to myself [for role in DTO] and recienve5mm [receivers]” and “Don [GRENIER] is referring to the # [tracking number] ending in 50 [last two digits for the tracking number for Harding Parcel 1] I believe.” JENKINS further shared mailing images of Harding Parcel 1 and Subject Parcels to HEISE and HERNANDEZ, and HEISE replied, “Ok OK so the one that ends in 50 [Harding Parcel 1] I believe from what Dan [Don] said is the tracking says it’s coming in Monday at 9 PM so it’s not here.”

36. HEISE shared further screenshots of Signal messages with GRENIER in which GRENIER updated HEISE on the delivery status of Harding Parcel 1 as well as the additional Subject Parcel that law enforcement identified through surveillance as placed into an Uber Connect ride to JENKINS by GRENIER. HEISE later described GRENIER attempting to obtain or identify the whereabouts for Harding Parcel 1, but ultimately concluding the parcel was stolen from GRENIER's residential building, as well as sharing an image of the USPS website showing the tracking status for the Subject Parcel to GRENIER associated with the Uber Connect ride to JENKINS.

37. Also, on or about May 23, 2022, they further discussed the status of the North Riverside Parcel. For example, JENKINS messaged, "Thanks we need to re-deliver [Individual A] immediately. This is a serious concern because we can't have a return to sender" and "Like [Individual A] has to be the number one urgent priority whatever we need to do we need to do." MCCORMICK asked, "Whats [Individual A]. Tracking [for North Riverside Parcel]" and JENKINS further messaged, "Return to sender Would mean that the sender [listed on parcel] would open the package and immediately called the cops [after discovering methamphetamine]. And that would mean investigators would come knocking on [Individual A's] door." MCCORMICK asked, "Ill ask if anyway to redirect" and JENKINS replied, "No redirect other than hold at post office for USPS." MCCORMICK replied, "Fuck." JENKINS then wrote, "it [North Riverside Parcel] needs to re-deliver to the address. They can give it outside

and we can swipe it.” HEISE later replied, “I have no problem swiping it but NY concern is that why hasn’t it just been delivered already...like just left in the porch.”

38. In reference to the North Riverside Parcel, on or about May 26, 2022, HEISE further stated, “On the plus side we [HEISE and HERNANDEZ] devised the scheme all night long and And we drafted a power of attorney documents [referenced by HERNANDEZ in a USPS Customer Service Call Center call concerning the parcel] that Jose’s gonna take get a you know Notarized and he has all the right paperwork to say that he is [Individual A’s] caregiver [Individual A] is in the hospital and he [HERNANDEZ] is allowed to pick up his mail and hes about to go get the package [North Riverside Parcel] right now from the Post Office.” HEISE also shared an image of a PDF file named “Durable Power of Attorney – [first name of Individual A].pdf.” HEISE further messaged, “Jose [HERNANDEZ] really went all out on this I mean hes pretty really smart when it comes to this s\*\*\* and if this [North Riverside Parcel] comes through i know im definitely guna comp him something.”

39. On or about May 26, 2022, JENKINS created a group chat with HEISE, utilizing the Heise Phone, and CS-1 entitled “new prices,” during which JENKINS discussed the pricing and sale of methamphetamine. On the same date, JENKINS messaged, “im realizing that will [KOCH] is a high maintenance receives [receiver] and prices were getting complex, so the pricing is i want 500 for every one [pound of methamphetamine] over what keith [MCCORMICK] charges. that means your current price is 2800 [per pound], or 100 an oz [ounce of methamphetamine]. in addition, i ask for a 1/3 cut on profits sold to my clients.” JENKINS further clarified,

“for example, if dan [HEISE] sells an oz to my client for 400, profit is 300 so dan [HEISE] pays 100.” JENKINS further messaged, “my inventory on hand + in progress (ie cash shipped) should be around 2 to 2.5 weeks sales [pounds of methamphetamine per week of sales]. with current volume, that means inventory should be between 10 and 15 lbs. the money due to me should be reinvested [on behalf of the DTO] to support those levels [of methamphetamine supply]. after you guys send your payments tomorrow [to MCCORMICK], we will be at 11 [pounds of methamphetamine].” JENKINS further messaged, “a note on cost: The amount i paid keith [MCCORMICK] have been as high as 2600 and as low as 2150 [for a pound of methamphetamine].”

40. Furthermore, on or about May 27, 2022, JENKINS shared an image in the group chat with MCCORMICK and HEISE showing a message which stated, “You can use 306 [Individual C name]. I would like whatever you would give me for receiving? [full mailing address for the Kenmore Parcel].” JENKINS further messaged, “keith [MCCORMICK, we need 4 [Subject Parcels] out today” and “to the address above, plus jose [HERNANDEZ], don [GRENIER], and will [KOCH].” Shortly after, MCCORMICK messaged images showing the mailing labels for Subject Parcels to HERNANDEZ and KOCH. JENKINS replied, “thanks a ton” and “now urgent need an overnigjt [overnight]” followed by the same previous image showing the recipient name and address for the Kenmore Parcel.

41. HEISE further discussed sending money to MCCORMICK and JENKINS responded, “Keith [MCCORMICK] I realized it Monday is memorial day

in this as I am all weekend and we are severely understocked [low on methamphetamine supply]" and "dan [HEISE], can Don [GRENIER] receive an overnight as well." HEISE affirmed and MCCORMICK later said, "Ill send today." MCCORMICK clarified, "Who gets overnight" and JENKINS replied, "it goes ro Don [GRENIER] and this new receiver [Individual C]." MCCORMICK and JENKINS further discussed pricing for sending Subject Parcels out overnight and sending "cash shipments" to MCCORMICK. JENKINS also stated, "keith [MCCORMICK], i think i need a 3<sup>rd</sup> overnighed to will [KOCH]." MCCORMICK later messaged, "3 ready to go"; Will [KOCH] on roscue [Roscoe]"; [Individual C] on Kenmore'; 'Jose [HERNANDEZ] on 60 th"; "Vacuum sealed bubble wraped peanuts and double boxed double taped [packaging for Subject Parcels]"; "Done w gloves"; "Wiped Clorox wipes"; "Confirm to ship overnight sat delivery"; and "Usps." JENKINS confirmed and MCCORMICK then provided images of the mailing labels for the Kenmore Parcel and the additional Subject Parcels mailed to HERNANDEZ and KOCH. JENKINS replied, "So that's all cross Our fingers that five [Subject Parcels] come tomorrow because That means inventory would be 7 [pounds of methamphetamine]."

42. On or about May 28, 2022, JENKINS further messaged, "keith [MCCORMICK], as oc [of] now th" and "the balance is zero. you sent us 7 [pounds of methamphetamine in Subject Parcels] and we sent 7 payments. this morning can please send one to don [GRENIER] and one to [Individual C]." MCCORMICK confirmed and JENKINS messaged, "awesome. things are good that we will receive 5 [Subject Parcels] today, which means 7.5 [pounds of methamphetamine] are

available for sale. 8.5 [pounds] if dan [HEISE] retrieves [Individual A – North Riverside Parcel]. i think suppliers start running out of product tomorrow and our sales peak sunday.” Regarding the North Riverside Parcel, HEISE further messaged, “K we are back at the post office” and “Jose [HERNANDEZ] just went in.” JENKINS later messaged to indicate to HEISE, “you should receive 2 [Subject Parcels] today” and “will’s got 2 [Subject Parcels] just now.” HEISE provided a further update on HERNANDEZ’s attempt to obtain the North Riverside Parcel and then stated, “Also Jose [HERNANDEZ] is waiting on 2 [Subject Parcels] and we [HEISE and HERNANDEZ] are watching the tracking so I will I have it I will be ready at work tonight.” On or about May 30, 2022, HEISE further messaged, “I got jose s [HERNANDEZ’s Subject Parcels] already.”

43. JENKINS and MCCORMICK further directly messaged each other via Signal and discussed JENKINS’ upcoming prison time and the transition of the DTO in Chicago to HEISE, among other things. For example, on or about June 1, 2022, MCCORMICK messaged, “You have 6 mo [months] and then your done” and “Just go through dan [HEISE] right.” JENKINS replied, “Yes I have a lot of stuff that I’ve been preparing That’ll pass off off.” JENKINS further discussed money owed to MCCORMICK. MCCORMICK replied, “He [HEISE] is going to make sure u get your cut [commission from Subject Parcels]” and “Or do i charge him more [for each shipment of methamphetamine] and send to u.”

44. On the same date, JENKINS then discussed sending narcotics proceeds to MCCORMICK, “overnighting 1 [parcel] to o street [street for Alhambra shipping

business where MCCORMICK receives mail] Unless you want us to hold somewhere else. ill do 4600 but can we agree ro to go 50 50 if something happens.” MCCORMICK replied, “if something happens to what” and “Look seriously shit is hella tight and our org [original] agreement was 2500 [per pound of methamphetamine] and you were picking it up then morphed to me taking on a whole lot of work and responsibilities with shipping and cost with paying and tipping cost of postage boxes storage [reference to shipping Subject Parcels] all around risk [from law enforcement] because of legal issues back there. So im making like 300 lb [per pound] ontop of that i have to grease connections [suppliers] and more. Really I dont think i could now if something goes wrong due to negligence on my part then i would work with you. Im really not in position to back this operation [DTO] to that extent. Plus you have to be making atleast 2x what i am. I understand u have dan [HEISE] to pay n expense’s also [related to Subject Parcel recipients] but this has completely changed.” JENKINS then discussed sending \$4,600 in a parcel to MCCORMICK and MCCORMICK provided JENKINS with a mailing address for a P.O. box associated to MCCORMICK at the Alhambra shipping business.

45. JENKINS and MCCORMICK further discussed the shipment of methamphetamine via the Subject Parcels, specifically referencing the Barry Parcel, North Riverside Parcel, Harding Parcel 1, and Kenmore Parcel. MCCORMICK messaged, “What did you u want” and “I have i think 5 or 6 lbs [pounds of methamphetamine].” JENKINS messaged, “i do want to comment about losses and fault. i dont believe it is good business to start a blame game on stuff. it looks like we

will have lost 4 [pounds of methamphetamine from the four intercepted Subject Parcels] in the last 2 weeks.” MCCORMICK replied, “What ones how come” and JENKINS further messaged: “[Individual A]: total fuck up situation. bad receiver was chosen and he [Individual A] flipped out. while dan [HEISE] chose [Individual A], i didnt interrogate dan [HEISE] enough about him and neither you nor i commented on the non chicago address [North Riverside Parcel addressed to Individual A was mailed to North Riverside, Illinois, which is located outside of Chicago]. my point is that mistakes are bound to happen always.” JENKINS further messaged, “then we had one [Subject Parcel containing methamphetamine, Harding Parcel 1] to don [GRENIER] was stolen” and “i’ve told dan [HEISE] that don [GRENIER] must be able to get the package within 30 minutes of arrival. But overall I would say let’s just an inherent risk that packages will be stolen.” JENKINS further messaged, “then there is [Individual B], Which we already discussed Clearly most of the blame lies with me Because I have decided to retire [Individual B] over [Individual D’s law enforcement contact]. JENKINS also messaged, “finally, we have Express shipment stuff in California [reference to Kenmore Parcel still showing as being located in California].”

46. On or about June 2, 2022, one day prior to going into federal custody, JENKINS created a Signal group message titled “transition” with HEISE and MCCORMICK during which JENKINS discussed the DTO organization going forward. JENKINS messaged, “So here is the agreement i’ve reached with Dan [HEISE];” “1. I maintain product [methamphetamine] ownership”; “2. Dan [HEISE]



will pay me 500 [dollars] over keith' [MCCORMICK]"; "keith's [MCCORMICK] price [for supplying methamphetamine]"; "3. Dan [HEISE] will send keith [MCCORMICK] 2300 when he has sold most of one [pound of methamphetamine]"; "4. For Steve's [JENKINS] clients [methamphetamine customers], Dan [HEISE] will pay steve [JENKINS] a 30% commission on the revenue over 200 and oz [ounce of methamphetamine] or 3200/lb [pound of methamphetamine] Note this does not apply to [Individual D's] and [CS-1's] arrangements [with JENKINS]." JENKINS also later stated that there "should be no banking activating [activity], including checks between any of us [to avoid detection by law enforcement]."

*Additional Seizures and Surveillances of Subject Parcels Associated to DTO*

47. On or about June 29, 2022, law enforcement conducted surveillance at HEISE's residence, at the 5100 block of South Neenah Avenue, in Chicago, and observed HEISE depart the area in his vehicle. HEISE subsequently travelled to a FedEx business location in Countryside, Illinois, during which HEISE appeared to mail FedEx envelopes before traveling back to his residence. Law enforcement later obtained information from FedEx showing a parcel listing HEISE as the shipper was mailed in Chicago on the same date and destined to MCCORMICK in Sacramento. Additionally, according to a preliminary review of records later obtained from FedEx, HEISE was listed as the shipper on over approximately 40 FedEx parcels mailed in Chicago to MCCORMICK from approximately May 2022 to January 2023. JENKINS was also identified as the listed shipper on approximately 20 FedEx parcels mailed in Chicago to MCCORMICK from approximately March 2022 to April 2022 (prior to

his incarceration) as well as approximately seven parcels mailed from December 2022 (after his incarceration) to January 2023. Based on information provided by CS-1 as well as communications recovered from the Jenkins Phone and the Jenkins Computer, and CS-1 phones, the FedEx parcels are all believed to contain narcotics proceeds owed to MCCORMICK related to the distribution of methamphetamine in the Subject Parcels.

48. On or about July 6, 2022, agents conducted surveillance on the delivery of one of the Subject Parcels shipped from Sacramento, on or about July 2, 2022, to the residence of HERNANDEZ. Law enforcement observed HERNANDEZ accept delivery of the Subject Parcel and HERNANDEZ shortly after that departing the residence with the Subject Parcel. HERNANDEZ entered an alley on foot and was observed to no longer to be carrying the Subject Parcel after continuing through the alley to the next block. Law enforcement subsequently recovered the outer box for the Subject Parcel from a garbage can for a separate residence in the alley. The outer box for the Subject Parcel was opened and ripped into several pieces, with the mailing label removed. According to a review of USPS records, an additional Subject Parcel was also identified as mailed to GRENIER on the same date as the Subject Parcel mailed to HERNANDEZ.

49. Beginning on or about July 6, 2022, CS-1 negotiated the purchase of one pound of methamphetamine for \$3,200 from HEISE, utilizing the Heise Phone, including the use of text messages, Signal communications, and consensually recorded phone calls. HEISE subsequently directed CS-1 to retrieve a Subject Parcel

suspected to contain the negotiated methamphetamine from KOCH (“Roscoe Parcel”). As part of the communications, HEISE sent CS-1 a screenshot of Signal messages between HEISE and MCCORMICK which showed an image of the Roscoe Parcel addressed to KOCH. CS-1 also communicated via text message and consensually recorded phone calls with KOCH, regarding KOCH’s knowledge of the methamphetamine suspected to be in the Subject Parcel and his involvement as a co-conspirator in the DTO. Law enforcement in Sacramento subsequently recovered surveillance video from the USPS post office from where the Roscoe Parcel was mailed on or about July 6, 2022, and identified the mailer as MCCORMICK, based on comparing him to his known driver’s license photo, along with two additional Subject Parcels mailed to the residences of GRENIER and HERNANDEZ.<sup>17</sup>

50. On or about July 11, 2022, law enforcement conducted surveillance of the delivery of the Roscoe Parcel, suspected to contain the methamphetamine to be purchased by the CS-1 from HEISE, to the residence of KOCH. After KOCH was observed accepting delivery of the Roscoe Parcel, KOCH contacted CS-1 regarding the arrival of the Roscoe Parcel. CS-1 subsequently obtained the Roscoe Parcel in

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<sup>17</sup> On or about June 2, 2022, law enforcement obtained a vehicle tracking warrant in the Eastern District of California for a vehicle (“McCormick Vehicle”) identified as utilized by MCCORMICK related to the mailing of the Kenmore Parcel and additional Subject Parcels on or about May 27, 2022. The court-authorized tracking data for the McCormick Vehicle showed it travelled to the area of the post office consistent with the time the Subject Parcels were mailed by MCCORMICK. As part of the investigation, additional vehicle tracking warrants were issued in the Eastern District of California for continued monitoring of McCormick Vehicle on or about July 15, 2022, August 30, 2022, October 13, 2022, and November 23, 2022. According to a preliminary review of tracking data for the McCormick Vehicle, the movement of the vehicle is consistent with routine trips to the Alhambra shipping business and mailings of the Subjects Parcels throughout the investigation.

person from KOCH. The Roscoe Parcel was recovered by law enforcement from CS-1 and found to contain an inner white cardboard box which further contained 443.9 grams of methamphetamine hydrochloride with a purity of approximately 98%. Following the recovery of the methamphetamine, CS-1 and HEISE further coordinated to exchange the money for the purchase. CS-1 then traveled to HEISE's residence, during which CS-1 provided the official funds to HEISE for the purchase of the pound of methamphetamine. Additionally, according to a review of USPS records, a total of more than approximately 10 Subject Parcels were mailed from Sacramento associated with the Alhambra shipping business and destined to KOCH from approximately February 2022 through September 2022 (including to the residence on the 1100 block of North Roscoe Street and a previous residence located on the 4200 block of North Broadway Street in Chicago).

51. On or about July 19, 2022, law enforcement conducted surveillance on the delivery of one of the Subject Parcels that had been shipped from Sacramento to the residence of HERNANDEZ, on or about July 15, 2022. After HERNANDEZ was observed accepting delivery of the Subject Parcel, law enforcement observed HEISE arrive at the residence in his vehicle and wait in front with an empty bag for several minutes, before then departing the area. Law enforcement later observed HERNANDEZ exit the residence carrying a large shoulder bag and proceed to walk to the residence of HEISE. Later the same day, HERNANDEZ was observed exiting the back of HEISE's residence carrying a flattened white box and depositing the box in a garbage can associated with another residence further down the alley. Law

enforcement subsequently recovered the opened outer box for the Subject Parcel recently delivered to HERNANDEZ, which law enforcement observed had the mailing label removed from the box. Law enforcement also recovered an empty inner white cardboard which was consistent with the inner packaging from previous seizures of methamphetamine from Subject Parcels. Shortly after HERNANDEZ left, law enforcement also observed HEISE depart his residence in a vehicle. According to a review of USPS business records, additional Subject Parcels were also identified as mailed to HEISE and GRENIER on the same date as the Subject Parcel mailed to HERNANDEZ.

52. On or about July 27, 2022, law enforcement in Sacramento executed a federal search warrant (E.D. Cal. Case No. 2:22-SW-0497-CKD) on a Subject Parcel shipped from Sacramento, on or about July 25, 2022, and destined to HERNANDEZ (“60<sup>th</sup> Street Parcel”). The 60<sup>th</sup> Street Parcel was found to contain an inner white cardboard box which further contained approximately 458 grams of suspect methamphetamine (pending laboratory results). Law enforcement subsequently reviewed surveillance video from the Alhambra shipping business and identified MCCORMICK as the mailer of the 60<sup>th</sup> Street Parcel, as well as additional Subject Parcels destined to the residences of HERNANDEZ and GRENIER on the same date.<sup>18</sup> According to a review of USPS records, a total of over approximately 60

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<sup>18</sup> A review by law enforcement of the court-authorized tracking data for the McCormick Vehicle on or about July 25, 2022 showed it travel to the area of the Alhambra shipping business consistent with the time the Subject Parcels were mailed by MCCORMICK on that date.

Subject Parcels were identified as mailed from Sacramento associated with the Alhambra shipping business and destined to HERNANDEZ from approximately May 2022 through February 2023.

53. According to a review of USPS business records, tracking inquiries were made to the USPS Customer Service Call Center regarding the 60<sup>th</sup> Street Parcel destined to HERNANDEZ. During the calls, the caller identified himself as HERNANDEZ and as the recipient of the 60<sup>th</sup> Street Parcel. HERNANDEZ inquired about the delivery status of the 60<sup>th</sup> Street Parcel further stated the contents contained an unknown birthday gift sent to him by a friend (HERNANDEZ's birthday is in April). USPS records also showed the Heise Phone also inquired about the status of the 60<sup>th</sup> Street Parcel.

54. Furthermore, HEISE, utilizing the Heise Phone, communicated via Signal with CS-1 regarding the 60<sup>th</sup> Street Parcel. For example, on or about July 29, 2022, HEISE messaged, "So little bit of bad news. The one [60<sup>th</sup> Street Parcel] I expected today is somehow lost in Cleveland [law enforcement scanned the 60<sup>th</sup> Street Parcel to appear as if it travelled to a Cleveland, Ohio USPS facility]." HEISE further provided a screenshot showing the USPS website tracking history for a parcel with transit scans consistent with the 60<sup>th</sup> Street Parcel and discussed with CS-1 the parcel's travel to Cleveland. HEISE also messaged, "I do have a few more [Subject Parcels] on the way though" and "Including one to will [KOCH]." On or about July 31, 2022, HEISE further messaged, "Turns out Keith [MCCORMICK] didn't put a delivery address on it" and "But I did the leg work and found it. Had my guy

[HERNANDEZ] call and confirm through tracking number and it's on the way." On or about August 3, 2022, HEISE messaged, "Keith [MCCORMICK] won't respond to me. Him or someone working for him fucked that Cleveland package [60<sup>th</sup> Street Parcel] and it got returned to sender. Now my receiver [HERNANDEZ] is freaking a Lil bit. Not too mention he's one of the very few receivers that I have."

55. On or about August 4, 2022, law enforcement executed a federal search warrant (N.D. Ill. Case No. 22 M 599) on one of the identified Subject Parcels shipped from Sacramento, on or about July 29, 2022, to the residence of GRENIER ("Harding Parcel 2"). Law enforcement recovered an inner white cardboard box which further contained 442.2 grams of methamphetamine hydrochloride with a purity of approximately 97%. Law enforcement in Sacramento subsequently recovered surveillance video from the Alhambra shipping business from where Harding Parcel 2 was mailed, and identified the mailer as MCCORMICK, along with additional Subject Parcels mailed on the same date and destined to the residences of HEISE, KOCH, and HERNANDEZ.<sup>19</sup> According to a review of USPS records, a total of over approximately 45 Subject Parcels were identified as mailed from Sacramento associated with the Alhambra shipping business and destined to GRENIER from approximately April 2022 through February 2023.

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<sup>19</sup> A review by law enforcement of the court-authorized tracking data for the McCormick Vehicle on or about July 29, 2022 showed it travel to the area of the Alhambra shipping business consistent with the time the Subject Parcels were mailed by MCCORMICK on that date.

56. According to a review of USPS business records, a tracking inquiry was made to the USPS Customer Service Call Center from the Grenier Phone regarding Harding Parcel 2 destined to GRENIER. The caller identified himself as GRENIER and as the recipient of Harding Parcel 2. During the call, GRENIER inquired about the delivery status of Harding Parcel 2 and provided a description of the contents as containing unspecified parts for customers. Additionally, HEISE, utilizing the Heise Phone, communicated via Signal with CS-1 regarding Harding Parcel 2. On or about August 2, 2022, after discussing the 60<sup>th</sup> Street Parcel, HEISE messaged, “My other guys [GRENIER] box [Harding Parcel 2] should have got there yesterday. It’s not yet [delivered]. Hopefully by tomorrow” and further stated, “Ugh I need a vacation. The stress from his shit is killing me.”

57. On or about August 22, 2022, law enforcement conducted surveillance on the delivery of one of the Subject Parcels shipped from Sacramento, on or about August 20, 2022, to the residence of HEISE. Law enforcement observed HEISE exit the residence and accepted delivery of the Subject Parcel from the porch area. Less than an hour later, law enforcement observed HERNANDEZ walk in the gangway to the back of HEISE’s residence. Shortly after, law enforcement observed HERNANDEZ and HEISE separately depart from the area of HEISE’s residence.

58. On or about September 2, 2022, law enforcement executed a federal search warrant (N.D. Ill. Case No. 22 M 692) on an identified Subject Parcel shipped from Sacramento, on or about August 26, 2022, to the residence of HEISE (“Neenah Parcel”). Law enforcement recovered an unsealed white envelope which contained



505.3 grams of methamphetamine hydrochloride with a purity of approximately 99%. Law enforcement in Sacramento subsequently recovered surveillance video from the Alhambra shipping business and identified the mailer of the Neenah Parcel as MCCORMICK, along with additional Subject Parcels mailed on the same date and destined to the residences of GRENIER and HERNANDEZ, as well as an additional Subject Parcel destined to HEISE.<sup>20</sup> Additionally, a total of over approximately 20 Subject Parcels were identified as mailed from Sacramento associated with the Alhambra shipping business and destined to HEISE from approximately March 2022 through September 2022.

59. According to a review of USPS records, several tracking inquiries were made to the USPS Customer Service Call Center from the Heise Phone regarding the Neenah Parcel. The caller identified himself as HEISE and as the recipient of the Neenah Parcel. During the calls, HEISE inquired about the delivery status of the Neenah Parcel and further indicated the contents of the Neenah Parcel were a birthday gift for HEISE believed to contain personalized clothing or fabrics. Additionally, HEISE, utilizing the Heise Phone, communicated via Signal with CS-1 regarding the Neenah Parcel. On or about September 13, 2022, HEISE messaged, “Got a few [Subject Parcels] shipped out today” and “Didn’t get the last 2 sent to me [reference to Neenah Parcel destined directly to HEISE] so I was short [of

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<sup>20</sup> A review by law enforcement of the court-authorized tracking data for the McCormick Vehicle on or about August 26, 2022 showed it travelled to the area of the Alhambra shipping business consistent with the time the Subject Parcels were mailed by MCCORMICK on that date.

methamphetamine supply] but you can get one of the ones coming” in reference to offering methamphetamine for sale to CS-1.<sup>21</sup>

60. On or about September 6, 2022, JENKINS was released from federal prison and assigned to reside at a halfway house.<sup>22</sup>

*Controlled Purchases of Methamphetamine from GRENIER*

61. Beginning on or about August 3, 2022, an UCO communicated with an initially unidentified individual via the Grindr application and discussed meeting in person for the purpose of purchasing a “ball” of methamphetamine for \$120. The individual further provided his name as “Don” [GRENIER] and his phone number as the same phone number as the Grenier Phone. The UCO and GRENIER further discussed the sale of methamphetamine and arranged to meet on or about August 22, 2022. On that date, the UCO obtained approximately 3.6 grams of suspect methamphetamine (pending laboratory results) from GRENIER. The UCO and GRENIER further discussed the purchase of an ounce of methamphetamine from GRENIER for \$500 at a later date.

62. Beginning on or about September 6, 2022, an UCO further communicated with GRENIER, utilizing the Grenier Phone, about the purchase of an

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<sup>21</sup> On or about September 28, 2022, CS-1 reported running into HEISE at a retail store. HEISE referenced the previously intercepted Neenah Parcel, found to contain methamphetamine, which was destined to HEISE’s residence. CS-1 observed HEISE to be at the store with another individual, who CS-1 positively identified as HERNANDEZ. HEISE indicated that HERNANDEZ was one of his Subject Parcel recipients.

<sup>22</sup> On or about October 6, 2022, JENKINS was arrested by the U.S. Marshals Service after violating his halfway house release. JENKINS remained in federal custody after till being released on or about December 1, 2022.

ounce of methamphetamine, discussed previously in August. On or about September 9, 2022, the UCO and GRENIER met in person at GRENIER's residence where the UCO purchased approximately 30 grams of suspect methamphetamine (pending laboratory results) from GRENIER for \$500. The UCO asked GRENIER about purchasing a half pound of methamphetamine and GRENIER stated he previously had purchased up to a quarter pound of methamphetamine at a time from his supplier for \$1,450. GRENIER stated he would reach out to his supplier (HEISE) and the UCO observed GRENIER open a communications application on his phone and type a message to an unknown individual on a thread which included an image of a mailing label. GRENIER further informed the UCO that GRENIER and his supplier (HEISE) were expecting several pounds of methamphetamine to arrive in a few days (Subject Parcels). GRENIER also provided a description of his supplier's residence and place/type of employment consistent with HEISE. GRENIER further requested to communicate with the UCO via the Signal application.

63. On or about September 20, 2022, the UCO and GRENIER, again utilizing the Grenier Phone, met in person at GRENIER's residence. The UCO purchased approximately 229.5 grams of suspect methamphetamine (pending laboratory results) for \$2,400. During the meeting, GRENIER informed the UCO he frequently receives packages (Subject Parcels) from Sacramento via the USPS which contain one pound of methamphetamine. GRENIER indicated he receives approximately 20 grams of methamphetamine from each Subject Parcel for personal use and for distribution to narcotics customers. GRENIER stated there are a total of

four individuals (identified by law enforcement as GRENIER, KOCH, HERNANDEZ, and HEISE) currently receiving Subject Parcels containing methamphetamine. GRENIER stated the Subject Parcels are mailed from Sacramento utilizing USPS because the U.S. mail requires a federal warrant for law enforcement to search, unlike utilizing private shipping companies.

*Additional Seizures and Surveillance Related to the DTO*

64. On or about November 10, 2022, law enforcement conducted surveillance of the delivery of a Subject Parcel shipped from Sacramento, on or about November 7, 2022, and addressed to MCCORMICK at a residence associated with relatives of MCCORMICK located on the 15700 block of Peggy Lane in Oak Forest, Illinois. Law enforcement subsequently identified MCCORMICK as accepting the delivery of the Subject Parcel at the residential building. Additionally, law enforcement identified a rental vehicle parked in the visitor's parking lot of the building which was determined to be rented to MCCORMICK beginning on or about the evening of November 8, 2022 from a rental location near Midway Airport in Chicago.

65. According to a review of USPS records, four additional Subject Parcels were also identified as mailed or about November 7, 2022 to GRENIER and HERNANDEZ. Additionally, three Subject Parcels (including another parcel destined to MCCORMICK, referred to as the "Peggy Parcel" below) were also mailed from the Alhambra shipping business the next day to MCCORMICK, GRENIER, and HERNANDEZ. Law enforcement in Sacramento subsequently recovered surveillance

video from the Alhambra shipping business and identified the mailer of the Peggy Parcel as MCCORMICK, along with additional Subject Parcels mailed from November 7 to November 8, 2022. MCCORMICK is therefore believed to have travelled to Chicago from Sacramento after mailing the Subjects Parcels on or about November 8, 2022.<sup>23</sup>

66. On or about November 15, 2022, law enforcement further conducted surveillance at the residence associated with MCCORMICK's relatives in Oak Forest and identified MCCORMICK park in front of the residential building in the same rental vehicle as observed several days prior. Law enforcement observed MCCORMICK exit the rental vehicle, retrieve two suitcases and a bag from the vehicle, and enter the front of the residential building.

67. On or about November 16, 2022, law enforcement executed a federal search warrant (N.D. Ill. Case No. 22 M 914) on the Subject Parcel shipped from Sacramento, on or about November 8, 2022, to MCCORMICK at the associated family residence in Oak Forest ("Peggy Parcel"). Law enforcement recovered a manila bubble mailer which contained 477.9 grams of methamphetamine hydrochloride with a purity of approximately 98%. According to a review of USPS records, a total of over

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<sup>23</sup> A review by law enforcement of the court-authorized tracking data for the McCormick Vehicle on or about November 7 and November 8, 2022 showed it travelled to the area of the Alhambra shipping business consistent with the time the Subject Parcels were mailed by MCCORMICK on both dates. On or about November 8, 2022, the McCormick Vehicle travelled to the Sacramento International Airport shortly after departing the Alhambra shipping business.

approximately five Subject Parcels were identified as mailed from Sacramento associated with the Alhambra shipping business and destined to the residence in Oak Forest associated with MCCORMICK from approximately May 2022 through February 2023.

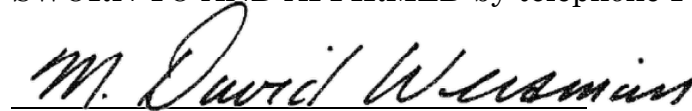
FURTHER AFFIANT SAYETH NOT.

/s/ Kevin E. Hegi (MDW with permission)

KEVIN E. HEGI

Postal Inspector, U.S. Postal Inspection Service

SWORN TO AND AFFIRMED by telephone February 15, 2023.

A handwritten signature in black ink, reading "M. David Weisman". The signature is written in a cursive, flowing style. The first letter "M" is large and prominent. The signature is positioned above a horizontal line.

Honorable M. DAVID WEISMAN

United States Magistrate Judge